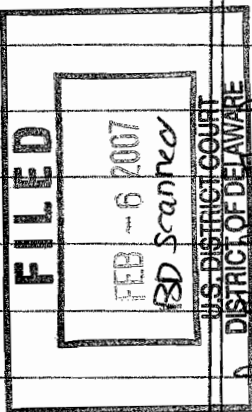


Case Number: 1:06-cv-773 (SLR)

"Amended Complaint"



On the 6th day of January, 2007 on my Housing
Pod 2D at Howard R. Young Correctional Institution
Around the hours of 4:30^{PM} & 5^{PM} our dinner was
being served, we was having dinner on the same
dirty trays, we had Turkey Ham and Mac & cheese
I took a Spoon Full of Mac & Cheese I Bit down
on something hard that broke my Tooth, when I
put my hands in my Mouth and pulled it out My Mouth
it was a Black Rock, Now my mouth is given me pain
Everyday I got to take Motrin 3 & 4 times a day
For the pain & it hurts alot. My tooth is broke off in
my gums, I made a dentist appointment to see the
dentist to see what he or she can do. I also have the
Rock For Evidence, in this Matter. also on the dates
of January 5th 6th 7th of 2007 Fish was being served
on these 3 days and I'm allergic to SeaFood and I
suppose to receive a diet tray when Fish is served
and the Medical department & Kitchen Department know
of my problem and it's "Noted" down that I receive
diet trays well I never received anything I told the
officers who was working these day officer McGill
officer Hastings they called the Sgt Denny and Lt
Williams these supervisors said they would handle
the situation But I was still given diet Fish trays
that I didn't eat I asked the officers what was
going on they said that this was on the supervisors
so after the meal was over each day I was never
given anything else.

(part 2) of amended complaint

they can do, so when Sgt Denny & Lt Williams made their rounds I (Emanuel H. Jones) spoke with them personally they said they would get me something to eat I never received anything and I never on these 3 days, this institution & supervisors are very responsible for me to eat instead they denied me of that ~~right~~ Right also at 12:00 O'clock shift change on the date of January, 5, 2007 I was having bad headaches and chest pain and I'm listed as a chronic care inmate cause I have high blood pressure and take medication for my blood pressure, I felt my blood pressure was high due to my headaches and chest pains I had to kick on the cell door for two hours and ten minutes before the officer came to see what the problem was then it took him another twenty minutes to get me down to medical, upon shift change and after shift change officers are suppose to make their rounds on the pod to make sure every inmates safe and is alright and they call every half in hour the officer never made any rounds until I I kick on the door, so if I never kicked on the door the officer would of never made any rounds to see what the problem was and that is very dangerous since I been here 3 inmates hung & killed they self and I may have had a stroke or a heart attack cause when I went to medical my blood pressure was checked it was 144 over 99 that's high I could have had or was on my way to having a stroke

(part 3) of amended complaint

on a Heart attack IF I didn't get to Medical and get Medication & checked, these OFFICERS is playing a very dangerous game By Not Making Rounds a Inmate just Killed His self Two or three week ago cause OFFICERS didn't make they Rounds and I could Be another dead Inmate it's a Mandator Right that these OFFICERS Make they Rounds on Each podded AREA, I'm Very Scared For My life in this Institution and I'm Scared I might don't survive Next time a OFFICER gets careless or lazy or want to Sleep. I would like to amend this complaint with my original complaint For Violation of My Constitutional and civil Rights pain & SUFFERING, cruel & unusual punishment I would like to Be compensated For lost of Tooth pain in My Mouth, compensated For Being deprived of My Meals, and compensated For Rights Violations Monetary Relief → Violation of Constitutional & civil Rights (\$ ^{Seventy thousand} 70.000) Pain & SUFFERING (\$ ^{Twenty thousand} 30.000) cruel & unusual punishment (\$ ^{Fifty thousand} 50.000) Compensatory Damage (\$ ^{one hundred thousand} 100.000) Punitive Damage (\$ ^{Fifty thousand} 50.000)

Sincerely yours

Emanuel H. Jones #557338

Howard R. Young Correctional Institution
1301 East 12th Street • P.O. Box 9561
Wilmington, DE 19809

(part.4) of amended complaint

On the 9th day of January 2007 at the Howard R Young Correctional Institution, at 230 PM on the 4 to 12 shift OFFICER SHARMA & OFFICER NORRIS was on duty the Medical Department came to 2D pod which I am housed at, to give medication out I Emanuel H. Jones #557338 was suppose to Review Medication For My Severe Back pains My Blood pressure, & Mental Health Medication For My depression Since I was on a 24 hour cell confinement sanction the OFFICERS above was suppose to let me out For My Medication they never did when they made rounds I told them I get medication they said the nurse left I told them they have to call her or him back so I can Review My Medication they said they wasn't doing anything or calling any body and left in front of My Room, I asked the OFFICER SHARMA again can he call the Sgt he came back and said there's Nothing Sgt Williams can do and For me to leave him alone I asked him For a Grievance Form he said it ain't any more and to get it on the next ~~on~~ shift. This OFFICER SHARMA deprived me of my Mandatory Medication why I was in severe pain & have High Blood pressure, & Mental Health Medication, I will also like to add to this Incident, & complaint, Violation of My civil & Constitutional Rights pain & suffering, Mental anguish and depression, Cruel, & unusual punishment

Monetary Relief # ^{one hundred thousand} 100,000 For all claims.

(part 5) amended complaint witnesses

My Witnesses to the amended Complaint

That heard OFFICER SHARMA say he ain't doing anything or call anybody. and deprived me of My Right to Medical care & Refuse to call the Doc! So I can Receive my Medication, and OFFICER SHARMA stated there Nothin Sgt Williams can do & denied me a Grievance Form. Now My Back is Hurting severely and I got Bad Head aches and chest pains. Now My Blood pressure is high cause of My head aches & chest pain these thing happen when My Blood pressure go up.

Markell M #315027
Lubice #188816

Emanuel H James #557338

Case Number: 1:06-cv-773-SLR

Amended Complaint

On the 18th day of January 2007 on
2D pod at the Howard R. Young Correctional Institution
at 2:00 O'clock PM OFFICER ARVANO was
on duty, I Emanuel H. Jones #557338 asked
OFFICER ARVANO can I have some disinfect
and some Bleach in my Bucket of water to
Sanitize my cell Room, OFFICER stated to me
I'm not giving you anything, I told him that
the OFFICERS is suppose to let us as inmates
disinfect our rooms, He stated again I'm not
giving you anything and for me to get out of
his face before He give me a 24 hour sanction
I ask can I see a Sgt or Lt he said shut up
and get the fuck away from me before he
call a code and the team come up here and
Beat ~~my~~ ^{my} Black ass. this OFFICER threats and
disrespect was not professional at all, this
OFFICER violated my constitutional & civil rights
and infringement of inmate rights

Sincerely yours
Emanuel H. Jones #557338

Howard R. Young Correctional Institution
1301 East 12th Street • P.O. Box 9561
Wilmington, DE 19809

you

Amended Complaint

4 to 12 shift

On the 22nd day of January 2007 on pod 2D at the Howard R. Young Correctional Institution. OFFICER Toussaint, OFFICER Cooke and Sgt Williams at dinner time around the hours of 4:30 pm & 5:20 ~~am~~ deprived me of my dinner meal by sending me to my room for a 24 hour sanction room confinement Sgt Williams then came to my room and asked me did I eat, I Emanuel H. Jones *55733 Stated Stated to the Sgt that I didn't eat he said if you didn't eat you ain't gonna eat and if you cause any trouble about not eating I will call a code on you and the quick Response Team will handle you and beat you like we beat everybody else who acts up and you won't live to tell anybody OFFICER Toussaint, OFFICER Cooke, Sgt Williams deprived me of my dinner meal and threaten my life to cause harm or even death.

Witnesses

1. Marshall ~~for~~ #315027
2. ~~Jack~~ Jenkins #2188816
3. Timothy Austin 377507
4. Lamar E. ~~How~~ 362185
5. Gabriel O'Cherico 177919
6. ~~Vin~~ Mangiacelli 203897 - 302-454-7777
7. E. Mathangy 443027.
8. Quinn MARTIN Quinn Martin 358947
9. Jason Smerov 355751
10. Joseph Reed Jr. ~~for~~ ~~meal~~ ~~for~~ 527280

Amended Complaint

On the 23rd day of January 2007 at the Howard R. Young Correctional Institution I Emanuel H. Jones #557338 was transferred to 1E pod for lock up. Officer Galli, Officer Baker, Lt Williams Sgt Williams started punching, kicking, choking me and sprayed me with Mace while the handcuffs was still on me. After they beat me I took to medical the nurse looked at me I told the nurse I was in pain from them beating me up the nurse did nothing and went by the officer word that I was ok and I wasn't ok so they transferred me back to 1E pod put me in room on the top bunk with know way for me to get up & down off the bunk, no ladder or steps. Nothing in medical & this institution know of my back pain and know I cant get up & down off a top bunk instead they let me go to a top bunk anyway, so I was tryin to get down to use the Bathroom I fell off the top bunk and fractured my right foot the institution medical call 911 and I was transferred to St Francis Hospital for my broken foot injury. I would like to hold this institution & medical department liable for my broken foot injury. There is also medical reports & records at St Francis Hospital on 1-23-07 around the hour of 1:30 am. and due to my condition I not suppose to be a top bunk.

Case Name: James V. Morris et al
 Case Number: 1:06-cv-674-SLR
 Amended Complaint

On the 27th day of May 2006, Officer Morris #24632 deprived me of Medical care with his threats to Refuse Medical treatment and his authority over me as a New Castle County Police Officer, this officer called me a Nigger then shot me in the Back with his Taser and put the handcuffs on me so tight that they left scars on my wrist. Now my Back stay in Severe pain every day I Take 5 or 6 different pain Medications & 1 or 2 different Type of Muscle Relaxers My Back is always hurting constantly, also I have alot of Nonphysical Injuries humiliation, Abarrassment, Feelings Emotional distress, Mental Depression & Stress Cause of this Officer Calling me a Nigger then shooting me in the Back with his Taser putting his knees in my Back where he shot me at then threaten my life at the police station to Refuse Medical treatment Now I'm always having Bad dreams of police hurting me, My Back always giving out on me, I can't sleep cause everytime I lay on my right side it hurts, I can't work a Normal Jo cause my Back is always hurting, I can't think or Focus right cause I always thinking of this officer hurting me and calling me a "Nigger" and threatening me, Now I think every Officer of the law is Racist and out to hurt me cause of this Officer action as a New Castle County Police Officer, he suppose

part 2 of amended complaint

To serve in protect not harm & threaten. OFFICER NORRIS #2463.2 caused a very serious injury to me and caused me physical and emotional indifferences to my Federal protected rights & constitutional and civil as a New castle police officer his actions was very evil, Reckless, careless & racist. also the New castle county Police Department is responsible and the over seers of each police officer conduct and OFFICER NORRIS "Swore" under oath to serve & protect But he don't serve & protect for people of color cause he is racist and don't like people of color so he harm them when ever he have a chance and I'm one of them people, The police Department of New castle county should be held liable for OFFICER NORRIS action & misconduct, also the chief and Internal Affairs department at New castle county Police Department was made aware of OFFICER NORRIS actions, and I Emmanuel.H. Jones asked them to do a investigation on OFFICER NORRIS, But never told me of any results of they investigation and never knew if they even investigated my allegations so I will also like to hold the New castle county Police Department accountable for OFFICER NORRIS #2463.2 actions & conduct as a ~~new~~ New castle county Police officer and I'll also like to file this lawsuit against OFFICER NORRIS in his personal capacity and his capacity as

part 3 of Amended Complaint

a New Castle County police OFFICER cause this OFFICER caused a very serious injury upon me and Nonphysical Injuries such as humiliation Emotional distress & Suffering disgrace, Feeling of degradation, Injury to Feelings, Fright, and Embarrassment. also OFFICER NORRIS Conduct amounted to Callous Indifferences to my Federally protected Rights to Be Free From, physical Violence, Mistreatment, threats, Harassment, Illegal detention, Illegal arrest, and Illegal searches and Seizures. OFFICER NORRIS actions was very Unconstitutional & Evil & Racist.

Sincerely
Yours

Emanuel H. Jones
SBI # 557338

Howard R. Young Correctional Institute
1301 East 12th Street • P.O. Box 956
Wilmington, DE 19809

Case Name: James V. NORRIS et al
 Case Number: 1:06-cv-674-SLR
 Amended Complaint

ON the 27th day of May 2006, OFFICER NORRIS #24632 deprived me of Medical care with his threats to Refuse Medical treatment and his authority over me as a New Castle County Police OFFICER, this OFFICER called me a Nigger then shot me in the Back with his Taser and put the handcuffs on me so tight that they left scars on my Wrist Now my Back stay in Severe pain every day I Take 5 or 6 different Pain Medications & 1 or 2 different Type of Muscle Relaxers My Back is always hurting constantly, also I have alot of Nonphysical Injuries humiliation, abarrassment, Feelings Emotional distress, Mental depression & Stress cause of this OFFICER calling me a Nigger then shooting me in the Back with his Taser putting his knees in my Back where he shot me at then threaten my life at the police station to Refuse Medical treatment Now I'm always having Bad dreams of police hurting me, My Back always giving out on me, I can't sleep cause everytime I lay on my Right side it hurts, I can't work a Normal Jo cause my Back is always hurting, I can't think or Focus right cause I always thinking of this OFFICER hurting me and calling me a "Nigger" and threaten me, Now I think every OFFICER of the law is Racist and out to hurt me cause of this OFFICER action as a New Castle County Police OFFICER has sworn

part 2 of amended complaint

To serve in protect not harm & threaten. OFFICER NORRIS #24632 caused a very serious injury to me and caused me physical and emotional indifferences to my Federal protected rights & constitutional and civil as a New castle police officer his actions was very evil, Reckless, careless & racist. also the New castle county Police Department is responsible and the over seers of each police officer conduct and OFFICER NORRIS "Swore" under oath to serve & protect But he don't serve & protect for people of color cause he is racist and don't like people of color so he harm them when ever he have a chance and im one of them people, The police Department of New castle county should be held liable for OFFICER NORRIS action & misconduct, also the chief and Internal Affairs department at New castle county Police Department was made aware of OFFICER NORRIS actions, and I Emanuel H. Jones asked them to do a investigation on OFFICER NORRIS, But never told me of any results of they investigation and never knew if they even investigated my allegations so I will also like to hold the New castle county Police Department accountable for OFFICER NORRIS #24632 actions & conduct as a ~~new~~ New castle county Police officer and I'll also like to file this lawsuit against OFFICER NORRIS in his personal capacity and his capacity as

part 3 of Amended Complaint

a New Castle County police OFFICER cause this OFFICER caused a very serious injury upon me and Nonphysical Injuries such as humiliation Emotional distress & Suffering disgrace, Feeling of degradation, Injury to Feelings, Fright, and Embarrassment. also OFFICER NORRIS conduct amounted to callous indifference to my Federally protected rights to be free from, physical violence, mistreatment, threats, harassment, illegal detention, illegal arrest, and illegal searches and seizures. OFFICER NORRIS actions was very unconstitutional & evil & racist.

Sincerely
YOURS

Emanuel H. Jones
SBI # 557338

Howard R. Young Correctional Institute
1301 East 12th Street • P.O. Box 956
Wilmington, DE 19809

Case Number: 06-1114 - (34001)
Case Name: Jance V. Norris et al

Amended Complaint

Monetary Relief

1. Violation of My Constitutional Rights \$ 50.000
2. Violation of My Civil Rights \$ 50.000
3. punitive Damage \$ 40.000
4. Compensatory Damage \$ 40.000
5. Pain & Suffering \$ 25.000
6. Mental, anguish, distress, depression \$ 40.000
7. cruel & unusual punishment \$ 25.000
8. Anguish \$ 25.000
9. Emotional distress & stress \$ 25.000

Case Number: 1:06-cv-773-SLR

Case Name: Delaware State Department of Corrections

STATE OF DELAWARE
DEPARTMENT OF CORRECTION
HOWARD R. YOUNG CORRECTIONAL INSTITUTION
OFFICE OF THE GRIEVANCE CHAIRPERSON
1301 E. 12TH STREET
WILMINGTON, DE 19801

MEMORANDUM

TO: Inmate Emanuel Jones 2 R

FROM: Sgt. Moody, Inmate Grievance Chairperson

DATE: 1/16/07

RE: YOUR RECENT GRIEVANCE # 92645

This memo is to inform you that the grievance submitted by you dated 1/16/07, regarding showers is not grievable for the following reason(s):

☐ The complaint was addressed by the IGC: _____

☐ Security issue (involves the security and/or staffing of the Institution and/or the safety, health, and/or welfare of inmates, staff and the public).

☐ Classification issues (security classification, jobs, transfers, programs, housing unit assignment).
Classification has its own appeal process. The inmate must write to the Treatment/Classification Unit within seven (7) days after the inmate receives the Classification decision. The letter must state that the inmate is appealing the classification and clearly indicate the reasons the inmate disagrees with the classification decision.

☐ Disciplinary issue. Disciplinary actions cannot be grieved but must be APPEALED within 24 hours of the Class I or Class II Hearing Decision. Complete an appeal form and mail it to the facility Hearing Officer within 24 hours of receiving the form. Please note that 24 loss of all privileges cannot be appealed.

☐ Parole Board Decision. The inmate must write a letter to the Parole Board within 30 days of the Board's decision. Expressing the desire to appeal the decision and listing the reasons. The Parole Board's address is: Board of Parole, Carvel State Office Building, 820 N. French Street, 5th Floor, Wilmington, DE 19801.

☐ Inmates cannot request or demand disciplinary action on staff. If you have a complaint regarding staff write a letter to that person's supervisor. In this case, that is:

☒ This is an issue/complaint that has already been grieved by you or another inmate. 88591

☐ Grievance is unacceptable because it has passed the seven (7) day time frame allotted to file a grievance.

☐ The grievance is a photocopy, carbon copy, written in pencil or red ink. Original grievance forms must be written in black or dark blue ink.

☐ This complaint is addressed in the Inmate Handbook. Refer to the handbook page _____ for clarification and/or direction.

Case Number: 1:06-cv-773-SLR

Case Name Delaware State Department of Corrections
Howard R. Young Correctional Institution
Inter-Dept. Memo

TO: Emanuel Jones 2/2/13
FROM: Sgt. M. Moody, Inmate Grievance Chair
DATE: 1/10/07
RE: GRIEVANCE # 92231

Please be advised that your grievance has been received in the office of the Grievance Chair regarding work in food.

If no one contacts you for an informal resolution or if your grievance can not be resolved informally, you will automatically be scheduled for a grievance hearing before the Resident Grievance Committee (RGC). Please keep in mind your grievance is only one of numerous others received in this office on a daily basis.

Thank you for your patience.

Case Number 1:06-cv-773-SLR

Case Name Delaware State Department of Corrections

Howard R. Young Correctional Institution

Inter-Dept. Memo

TO:

NO longer here
Emmanuel Jones *210*

FROM:

Sgt. M. Moody, Inmate Grievance Chair

DATE:

12/21/06

RE:

GRIEVANCE # *06-88592*

Please be advised that your grievance has been received in the office of the
Grievance Chair regarding *rodents*.

If no one contacts you for an informal resolution or if your grievance can not
be resolved informally, you will automatically be scheduled for a grievance
hearing before the Resident Grievance Committee (RGC). Please keep in
mind your grievance is only one of numerous others received in this office
on a daily basis.

Thank you for your patience.

Case Number: 1:06-cv-773-SLR

Case Name: Delaware State Department of Corrections

Howard R. Young Correctional Institution
Inter-Dept. Memo

TO:

Emmanuel Jones *EM*

FROM:

Sgt. M. Moody, Inmate Grievance Chair

DATE:

12/21/06

RE:

GRIEVANCE # 06-88623

Please be advised that your grievance has been received in the office of the

Grievance Chair regarding

dirty trays

If no one contacts you for an informal resolution or if your grievance can not be resolved informally, you will automatically be scheduled for a grievance hearing before the Resident Grievance Committee (RGC). Please keep in mind your grievance is only one of numerous others received in this office on a daily basis.

Thank you for your patience.

Case Number: 1:06-cv-773-SLR

Case Name Delaware State Department of Corrections

Howard R. Young Correctional Institution
Inter-Dept. Memo

TO:

Emanuel Jones *2nd*

FROM:

Sgt. M. Moody, Inmate Grievance Chair

DATE:

12/21/06

RE:

GRIEVANCE # *06-88591*

Please be advised that your grievance has been received in the office of the Grievance Chair regarding *showers*.

If no one contacts you for an informal resolution or if your grievance can not be resolved informally, you will automatically be scheduled for a grievance hearing before the Resident Grievance Committee (RGC). Please keep in mind your grievance is only one of numerous others received in this office on a daily basis.

Thank you for your patience.

Case Name:

Jones V. Delaware State
Department of Correction



Case Number: 1:06-cv-773
(SLR)

STATE OF DELAWARE
DEPARTMENT OF CORRECTION
HOWARD R. YOUNG CORRECTIONAL INSTITUTION
1301 EAST 12TH STREET
WILMINGTON, DELAWARE 19809
Telephone: (302) 429-7747
Fax: (302) 429-7716

Raphael Williams
Warden IV

MEMORANDUM

TO: Emanuel Jones, 557338
2D Pod

FROM: Warden Raphael Williams

DATE: December 18, 2006

SUBJ: **YOUR RECENT CORRESPONDENCE**

Your correspondence has been forwarded to Major Williams for review and any action deemed appropriate.

RW:adc

DISTRIBUTION

Major Dave Williams
File